



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RQ-2

September 7, 2016

DATHAN VOELTER, TREASURER
KEEP THE PROMISE PAC
P.O. BOX 92225
AUSTIN, TX 78709-2225

Response Due Date

10/12/2016

IDENTIFICATION NUMBER: C00575415

REFERENCE: AMENDED APRIL MONTHLY REPORT (03/01/2016 - 03/31/2016),
RECEIVED 05/20/2016

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 3 item(s):

1. Schedule B supporting Line 21(b) of your report discloses apparent payments of debts for independent expenditures incurred during previous reporting periods. If the original amount of these expenditures was reported incorrectly, then the original reports should be amended to correct this disclosure. However, if these entries represent payment of debts for independent expenditures, then these transactions should be itemized as non-MEMO entries on Schedule E supporting Line 24 of the Detailed Summary Page. Please amend your report to correct these discrepancies or provide clarification regarding these transactions.
2. Schedule E supporting Line 24 of your report discloses \$52,586.18 in activity paid to "AGE Graphics," "Aledo Grafix, Inc.," "Campaign Data Solutions, LLC," "Campaign Sidekick," "Facebook," "RiverCity Print & Imaging, Inc." and "SirSpeedy" that does not appear to have been disclosed on a prior report, even though the disbursement dates reflect dates within a prior reporting period. Please amend your report to provide clarifying information regarding this activity. (11 C.F.R. § 104.3(a) and (b))

If these entries represent independent expenditures that were paid in a reporting period before they were disseminated, there are two methods of disclosure. Using the first method, you may disclose the payment on Schedule B

KEEP THE PROMISE PAC

Page 2 of 3

supporting Line 21(b) as an operating expenditure. In a subsequent period when the independent expenditure is publicly disseminated, you should disclose the independent expenditure on Schedule E and disclose the same amount on Schedule B supporting Line 21(b) as a negative entry. You should provide a cross reference between these entries. Using the second method, you would disclose the independent expenditure on Schedule E at the time the payment is made. You would disclose the date of payment and, if known, the date of dissemination. With the second method, no other reporting obligation is required, except for filing any necessary 24 or 48 Hour Reports and including a cross reference between the entries.

3. Your committee filed an Amended 2016 March Monthly Report, received 4/20/16, and an Amended 2016 April Monthly Report, received 5/20/16, disclosing independent expenditures made in support or opposition of federal candidates with "Facebook" as the payee(s). However, the states of election disclosed on Schedule E do not appear to correlate between reports. If your committee has filed made independent expenditures not consistently reflected on your reports, you must file Schedule E during the appropriate reporting period to disclose these payments. Please amend your report to clarify this discrepancy and provide further information concerning these report(s). (11 CFR §104.4)

- Schedule B of your report discloses an expenditure(s) for "Digital Media Production/Placement," "Event Filming," "Event Media," "Event Production," "Printing," "Radio Advertising" and "Robo Calls." For your information and consideration when preparing future filings, if a portion or all of these expenditures were for public communications (as defined by 11 CFR §100.26) containing express advocacy as defined under 11 CFR §100.22, this would constitute an independent expenditure and would be disclosed on a Schedule E supporting Line 24. Public communications that refer to a clearly identified Federal candidate, but that do not expressly advocate the election or defeat of that candidate would be reported on Schedule B for Line 21(b) of the Detailed Summary Page.

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will**

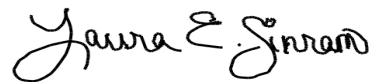
KEEP THE PROMISE PAC

Page 3 of 3

not be considered.

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1157.

Sincerely,

A handwritten signature in black ink that reads "Laura E. Sinram". The signature is written in a cursive style with a large, stylized "L" and "S".

Laura Sinram
Sr. Campaign Finance & Reviewing Analyst
Reports Analysis Division